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JUL - 8 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

HENRY A. SOLOMON  
ADMITTED IN VA AND D.C.

OUR FILE NO.  
0321-117-66

July 8, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: MM Docket No. 91-221; MM Docket No. 87-8;  
MM Docket No. 94-150; MM Docket No. 92-51  
and MM Docket No. 87-154

Dear Mr. Caton:

In response to the Commission's Public Notice (DA 97-1246) of June 17, 1997, requesting parties to television Local Marketing Agreements to submit certain information in connection with the above-referenced proceedings, there are transmitted herewith an original and four copies of the "Joint Response of Global Communications, Inc. and WMDN, Inc." Global Communications, Inc. is the licensee of Television Station WGBC, Channel 30, Meridian, Mississippi. WMDN, Inc. is the licensee of Television Station WMDN, Channel 24, Meridian, Mississippi.

If there are any questions in regard to this matter, kindly communicate directly with undersigned counsel for WMDN, Inc. and Todd M. Stansbury, Esq., Wiley, Rein & Fielding, 1776 K Street, N.W., Washington, D.C. 20006.

Respectfully submitted,

WMDN, INC.

By 

Henry A. Solomon  
Its Attorney

HAS:dh  
Enclosure

cc: Todd M. Stansbury, Esq. (w/encl.)

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Before The  
**Federal Communications Commission**  
Washington, D.C. 20554

JUL - 8 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In The Matter Of	)	
	)	
Review of the Commission's Regulations	)	MM Docket No. 91-221
Governing Television Broadcasting	)	
	)	
Television Satellite Stations Review of	)	MM Docket No. 87-8
Policy and Rules	)	
	)	
Review of the Commission's Regulations	)	MM Docket No. 94-150
Governing Attribution of Broadcast and	)	
Cable/MDS Interests	)	
	)	
Review of the Commission's Regulation's	)	MM Docket No. 92-51
and Policies Affecting Investment in the	)	
Broadcast Industry	)	
	)	
Reexamination of the Commission's	)	MM Docket No. 87-154
Cross-Interest Policy	)	

TO: The Commission

**JOINT RESPONSE OF GLOBAL COMMUNICATIONS, INC.  
AND WMDN, INC.**

By Public Notice (DA 97-1246) of June 17, 1997, the Commission requested all parties to television Local Marketing Agreements to submit certain information in connection with the above-captioned proceedings. Pursuant to the requirements set forth in that Public Notice, Global Communications, Inc., licensee of WGBC(TV), Channel 30, Meridian, Mississippi, and WMDN, Inc., licensee of WMDN(TV), Channel 24,

Meridian, hereby submit their joint response, attached hereto, to the  
nine areas of inquiry posed by the Commission.

Respectfully submitted,

**GLOBAL COMMUNICATIONS, INC.**

By: Todd M. Stansbury *By mts*  
Todd M. Stansbury  
Its Attorney

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**WMDN, INC.**

By: Henry A. Solomon  
Henry A. Solomon  
Its Attorney

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July 8, 1997

<b>Meridian, MS- DMA 183</b>					Overlap	Audience Share <sup>1</sup>	Network Affiliation
	<u>Call Sign</u>	<u>Channel</u>	<u>Licensed Community</u>	<u>Licensee</u>	There is 100% overlap of the stations' City Grade contours.	<u>11/96</u> <u>2/97</u> <u>5/97</u>	NBC primary-Fox secondary
Brokered Station:	WGBC(TV)	30	Meridian, MS	Global Communications, Inc.		8 8 8	
Brokering Station:	WMDN(TV)	24	Meridian, MS	WMDN, Inc.		13 10 11	

	<u>Execution Date</u>	<u>Term</u>	<u>Start Date</u>	<u>End Date</u>	<u>Renewal</u>	<u>Renewal Terms</u>	<u>% Time Brokered</u>
LMA Specifics:	08/01/95	5 years	08/01/95	08/01/00	Yes	Renewal option for additional 5-yr. term on 60-days notice	98% Brokered station retains full pre-emption rights.

**Benefits:**

This LMA permits two UHF stations in a small market dominated by WTOK-TV (ABC), Channel 11 to achieve financial viability and thus to continue operating. WTOK-TV has been the air for approximately 40 years. Moreover, as explained below, for several years Channel 11's competitor was only one of the two

<sup>1</sup> 9 a.m. to 12 midnight.

stations broadcasting in the three-station Meridian market. For at least a year, WTOK-TV was the only station on the air in Meridian.

When it was acquired by its present owners, WGBC had been off the air for approximately two years. In fact, the station had been burned to the ground. It returned to the air in 1992. WMDN was re-activated in 1994, after having been off the air for approximately two years and in Chapter 11 bankruptcy. Indeed, WMDN, Inc.'s affiliate, Central Television, Inc., rescued Channel 24 from its first bankruptcy in the 1990s, and secured a network affiliation. The station was subsequently sold by Central and shortly thereafter its new owners sought Chapter 11 protection. Channel 24 was then re-acquired by Central's affiliate, WMDN, Inc. Indisputably, the UHF-TV survival rate in Meridian has been dismal.

The LMA has tangibly benefited the licensees and viewers of the two UHF stations. It has enabled them to simulcast a nightly 35-minute news program (M-F) originating from WMDN's local studios. This arrangement began within the past six months.

The time brokerage agreement was instrumental in persuading Fox to grant each station a secondary affiliation. Consequently, weekly Major League Baseball and games of the NFC and AFC are enjoyed by WGBC and WMDN viewers who would not otherwise have access to such programming because Meridian's cable penetration is only approximately fifty percent. In 1996, but for the LMA, only one-half of the population of Meridian would have been able to view the World Series and the Super Bowl. Furthermore, by virtue of WMDN's secondary Fox affiliation, its viewers are able to enjoy NFC games. WGBC, a primary NBC affiliate, does not accept the Fox NFC feed, but telecasts AFC games furnished by NBC. Thus, programming choices have been enhanced by the time brokerage arrangement.

As mentioned, the nightly news is broadcast over both stations: Without the LMA neither station would be able to support a news staff. Nor could the licensees entertain (as they are now doing) plans to expand news staff and simulcast news programming during other dayparts. Indeed, the LMA has enabled WGBC to reinstate local news broadcasts. Local news had been carried by Channel 30 until February 1995, but had to be discontinued due to budgetary constraints. Finally, both stations carry news specials, cover elections, carry locally produced morning talk shows and "Eye on Meridian" specials. These programs could not be offered by either station at this time absent the time brokerage arrangement.

Accordingly, the technical, operational and other synergies achieved by this arrangement have unquestionably enabled the UHF stations to achieve and maintain financial viability and to improve their ratings in a market where their competitor is a well-entrenched, dominant VHF network affiliate. We submit that the public interest will clearly be served by continuation of the LMA.